

Dear FCC Commissioners:

I am an engineer and an amateur radio operator, and I am writing to you about NPRM 06-164 regarding tower markings and migratory birds.

I suggest that NO changes be made to any current tower requirements, as it is my opinion that current regulations are sufficient. I do NOT want to see a requirement for white flashing strobe lights on radio towers over the current red requirements.

Also, it is my scientific opinion that these rapid intense flashing white strobe lights on radio towers could set-off seizures in people pre-disposed to that condition, and I believe that the FCC should look into seizures being caused by white flashing strobe lights on towers, instead of being concerned about birds. The physical health of humans is more important than animal life, and perhaps this would warrant further investigation, and perhaps prohibit white strobes from radio towers?

It is my opinion that slow-flashing red lights at the top of the tower, and red steady or flashing lights at specified distances along the length of the tower are appropriate for lighting at night. In addition, alternating red and white paint on tower facing is appropriate as currently specified for daytime markings.

Any animals 'crashing into' radio towers with red and white paint and red lighting are destined by 'natural selection' and there isn't much more that humans should be required to do.

I seriously question how the numbers of bird kills have been extrapolated in your inquiry, as the number seems incredibly overestimated. I have seen birds killed by high-voltage power towers, HV power lines and even glass-windowed 20 story buildings, but only one by a radio tower. If there are obstructions and birds, there will be collisions – it's a fact of nature. In my part of the country, large numbers of migratory birds are killed by firearms by licensed hunters. In other words, migratory bird death is going to happen, and the ends don't justify the means.

In summary – I suggest that the FCC leave all tower rules as they are at this time – and don't add any new restrictions whatsoever by the FCC or by the FAA.

Thank you.
John Pavlica, Jr.